

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES COURT
SOUTHERN DISTRICT OF TEXAS
FILED
AUG 17 2006
MICHAEL M. MILBY, CLERK OF COURT

UNITED STATES OF AMERICA

v.

EUGENE H. WILLIAMS JR.,
Defendant

§
§
§
§
§
§

CRIMINAL NUMBER: H-06-237-S

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

1. A “Destructive Device” is a “firearm” regulated by law in Title 26 of the United States Code.

2. Destructive devices are required by law to be identified and registered in the National Firearms Registration and Transfer Record (NFRTR) to a person or entity entitled to possession of them. A person who receives or possesses a destructive device not registered to him/her in the NFRTR violates the law.

3. The transfer of destructive devices is required by law to be documented, taxed, and approved by the Attorney General of the United States (or his designates) prior to the actual transfer of possession taking place. In addition, the transferee must be identified in the NFRTR as the new person entitled to possession of the destructive devices before any actual transfer takes place.

4. Sections 55.207, 55.208, and 55.218 of Title 27 of the Code of Federal Regulations mandate that “magazines,” or structures that house high explosive material, be constructed in a

specific manner and be located a specified distance from inhabited buildings, public highways, and/or passenger railways.

COUNT ONE

On or about August 31, 2004, in the Houston Division of the Southern District of Texas,

EUGENE H. WILLIAMS, JR.,

defendant herein, did knowingly or intentionally receive and possess one or more firearms which was not registered to the defendant in the National Firearms Registration and Transfer Record, namely, one or more of the following items defined in Section 5845 of Title 26, United States Code as destructive devices:

1. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0075;
2. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0051;
3. A Precision Ordnance Products, Stingmore Area Protective Device, Model T-454, serial number 454-98-0075;
4. A Precision Ordnance Products, Multi-Ultra Flash Grenade, Model DD-451, serial number 451-00-1663;
5. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0052;
6. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0053;
7. A Precision Ordnance Products, Magnum Tactical Blast Stun Grenade, Model T-470, serial number 470-99-0121;
8. A Precision Ordnance Products, Magnum Ultra-Flash Stun Grenade, Model T-471, serial number 471-01-0315;
9. A Precision Ordnance Products, Tactical Blast Stun Grenade, Model T-429, serial number 429-01-0325;

10. A Precision Ordnance Products, Tactical Blast Stun Grenade, Model T-429, serial number 429-01-0328;
11. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0329;
12. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0330;
13. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0331;
14. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0332;
15. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0333;
16. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0334;
17. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0335;
18. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0336;
19. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0338;
20. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0086;
21. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0103;
22. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0104;
23. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0105;
24. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0106;
25. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0107;
26. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0108;
27. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0109;
28. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0110;

29. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0111;
30. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0112;
31. A Precision Ordnance Products, Multi-Blast Grenade, Model DD-450, serial number 450-01-0442;
32. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0196;
33. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0198;
34. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-01-0892;
35. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-01-0895;
36. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-01-0899;
37. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-01-0900;
38. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0817;
39. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0819;

In violation of Title 26, United States Code, Sections 5841, 5861(d) and 5871.

COUNT TWO

On or about August 31, 2004, in the Houston Division of the Southern District of Texas,

EUGENE H. WILLIAMS, JR.

defendant herein, did knowingly or intentionally receive and possess one or more firearms which was transferred to him in violation of Chapter 53 of Title 26, namely, one or more of the following items

defined in Section 5845 of Title 26, United States Code as destructive devices:

1. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0820;
2. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0821;
3. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0822;
4. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0150;
5. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0152;
6. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0153;
7. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0154;
8. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0155;
9. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0156;
10. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0157;
11. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0158;
12. A Precision Ordnance Products, Magnum Tactical Blast Stun Grenade, Model T-470, serial number 470-99-0223;
13. A Precision Ordnance Products, Magnum Tactical Blast Stun Grenade, Model T-470, serial number 470-99-0224;
14. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-0711;
15. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1007;
16. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1009;
17. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1010;
18. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1012;

19. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1016;
20. A Precision Ordnance Products, Standard Flexible Door Breaching Charge (2 units), Model B-520, serial number 520-98-0069;
21. A Precision Ordnance Products, Tactical Blast Stun Grenade, Model T-429, serial number 429-02-1792;
22. A Precision Ordnance Products, Multi-Blast Grenade, Model DD-450, serial number 450-02-1311;
23. A Precision Ordnance Products, Multi Ultra Flash Grenade, Model DD-451, serial number 451-02-1186;
24. A Precision Ordnance Products, Multi Ultra Flash Grenade, Model DD-451, serial number 451-02-1187;
25. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-02-0399;
26. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-02-0400;
27. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-02-0615.
28. A Precision Ordnance Products, Bursting Rubber Gas Grenade, Model G-310, serial number 310-98-0162.
29. A Precision Ordnance Products, Bursting Rubber Smoke Grenade, Model DD-359, serial number 359Q-99-0588
30. A Precision Ordnance Products, Bursting Rubber Smoke Grenade, Model DD-359, serial number 359Q-99-0590
31. A Precision Ordnance Products, Bursting Rubber Smoke Grenade, Model DD-359, serial number 359Q-99-0591
32. A Precision Ordnance Products, Illuminator Grenade, Model DD-408, serial number 408-98-0203.
33. A Precision Ordnance Products, Multi-Blast Grenade, Model DD-450, serial number 450-00-_____
34. A Precision Ordnance Products, "Bruiser" Rubber Impact Grenade, Model I-453, serial number 453-98-0422.

In violation of Title 26, United States Code, Sections 5812, 5861(b) and 5871.

COUNT THREE

On or about July 18, 2004, in the Houston Division of the Southern District of Texas,

EUGENE H. WILLIAMS, JR.,

defendant herein, did knowingly or intentionally possess a firearm which was not registered to the defendant in the National Firearms Registration and Transfer Record, namely, the following item defined in Section 5845 of Title 26, United States Code as a destructive device:

A Precision Ordinance Products, Tactical Blast Stun Grenade, Model T-429.

In violation of Title 26, United States Code, Sections 5841, 5861(d) and 5871.

COUNT FOUR

On or about August 27, 2004, in the Houston Division of the Southern District of Texas,

EUGENE H. WILLIAMS, JR.,

defendant herein, did knowingly or intentionally possess a firearm which was not registered to the defendant in the National Firearms Registration and Transfer Record, namely, a destructive device as defined in Section 5845 of Title 26, United States Code.

In violation of Title 26, United States Code, Sections 5841, 5861(d) and 5871.

COUNT FIVE

On or about August 31, 2004, in the Houston Division of the Southern District of Texas,

EUGENE H. WILLIAMS, JR.

defendant, herein, did knowingly or intentionally possess one or more firearms which was not identified by a serial number as required by Chapter 53 of Title 26, United States Code, namely, one or more of the following items defined in Section 5845 of Title 26, United States Code as destructive devices:

1. A Precision Ordnance Products, Ultra-Flash Stun Grenade, Model T-459, no serial number
2. A Precision Ordnance Products, "Bruiser" Rubber Impact Grenade, Model I-453, no serial number
3. A Precision Ordnance Products, Distraction Device--label removed, no serial number
4. A Precision Ordnance Products, Lock Breaching Charges--no markings, no serial number
5. A Precision Ordnance Products, Rubber Impact Grenade--no markings, no serial number.

In violation of Title 26, United States Code, Sections 5842(c), 5861(i) and 5871.

COUNT SIX

On or about the October 5, 2002 through August 31, 2004 in the Houston District of the Southern District of Texas,

EUGENE H. WILLIAMS, JR.,

defendant herein, did aid, abet, counsel and assist others known and unknown to the grand jury and did knowingly store high explosives in a manner not in conformity with regulations promulgated by the Attorney General pursuant to Section 847 of Title 18, United States Code, in that the defendant(s) stored high explosive material in an office at 1603 Ash Meadow; Houston, Texas, said office not then conforming with the requirements of appropriate storage facilities; and said explosives involved in this offense included one or more of the following items defined in Section 5845 of Title 26, United States Code as destructive devices:

1. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0075;
2. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0051;
3. A Precision Ordnance Products, Stingmore Area Protective Device, Model T-454, serial number 454-98-0075;
4. A Precision Ordnance Products, Multi-Ultra Flash Grenade, Model DD-451, serial number 451-00-1663;
5. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0052;
6. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0053;
7. A Precision Ordnance Products, Magnum Tactical Blast Stun Grenade, Model T-470, serial number 470-99-0121;
8. A Precision Ordnance Products, Magnum Ultra-Flash Stun Grenade, Model T-471, serial number 471-01-0315;
9. A Precision Ordnance Products, Tactical Blast Stun Grenade, Model T-429, serial number 429-01-0325;
10. A Precision Ordnance Products, Tactical Blast Stun Grenade, Model T-429, serial number 429-01-0328;
11. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0329;
12. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0330;

13. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0331;
14. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0332;
15. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0333;
16. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0334;
17. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0335;
18. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0336;
19. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0338;
20. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0086;
21. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0103;
22. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0104;
23. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0105;
24. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0106;
25. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0107;
26. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0108;
27. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0109;
28. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0110;
29. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0111;
30. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0112;
31. A Precision Ordnance Products, Multi-Blast Grenade, Model DD-450, serial number 450-01-0442;

32. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0196;
33. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0198;
34. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-01-0892;
35. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-01-0895;
36. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-01-0899;
37. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-01-0900;
38. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0817;
39. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0819;
40. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0820;
41. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0821;
42. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0822;
43. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0150;
44. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0152;
45. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0153;
46. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0154;
47. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0155;
48. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0156;
49. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0157;
50. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0158;

51. A Precision Ordnance Products, Magnum Tactical Blast Stun Grenade, Model T-470, serial number 470-99-0223;
52. A Precision Ordnance Products, Magnum Tactical Blast Stun Grenade, Model T-470, serial number 470-99-0224;
53. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-0711;
54. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1007;
55. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1009;
56. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1010;
57. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1012;
58. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1016;
59. A Precision Ordnance Products, Standard Flexible Door Breaching Charge (2 units), Model B-520, serial number 520-98-0069;
60. A Precision Ordnance Products, Tactical Blast Stun Grenade, Model T-429, serial number 429-02-1792;
61. A Precision Ordnance Products, Multi-Blast Grenade, Model DD-450, serial number 450-02-1311;
62. A Precision Ordnance Products, Multi Ultra Flash Grenade, Model DD-451, serial number 451-02-1186;
63. A Precision Ordnance Products, Multi Ultra Flash Grenade, Model DD-451, serial number 451-02-1187;
64. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-02-0399;
65. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-02-0400;
66. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-02-0615
67. A Precision Ordnance Products, Bursting Rubber Gas Grenade, Model G-310, serial number 310-98-0162.
68. A Precision Ordnance Products, Bursting Rubber Smoke Grenade, Model DD-359, serial number 359Q-99-0588
69. A Precision Ordnance Products, Bursting Rubber Smoke Grenade, Model DD-359, serial number 359Q-99-0590

70. A Precision Ordnance Products, Bursting Rubber Smoke Grenade, Model DD-359, serial number 359Q-99-0591
71. A Precision Ordnance Products, Illuminator Grenade, Model DD-408, serial number 408-98-0203.
72. A Precision Ordnance Products, Multi-Blast Grenade, Model DD-450, serial number 450-00-_____
73. A Precision Ordnance Products, "Bruiser" Rubber Impact Grenade, Model I-453, serial number 453-98-0422
74. A Precision Ordnance Products, Ultra-Flash Stun Grenade, Model T-459, no serial number
75. A Precision Ordnance Products, "Bruiser" Rubber Impact Grenade, Model I-453, no serial number
76. A Precision Ordnance Products, Distraction Device--label removed, no serial number
77. A Precision Ordnance Products, Lock Breaching Charges--no markings, no serial number
78. A Precision Ordnance Products, Rubber Impact Grenade--no markings, no serial number

In violation of Title 18, United States Code, Sections 2, 842(j) and 844(b), and 27 C.F.R. Secs. 55.201 et seq., (1987).

Notice of Criminal Forfeiture

Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice that the firearm involved in, or used in the commission of the offenses in violation of Title 26, United States Code, Section 5861 and Title 18, United States Code, Sections 371 and 842(j) charged in Counts One through Seven, are subject to forfeiture, including, but not limited to, the following:

1. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0075;
2. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0051;
3. A Precision Ordnance Products, Stingmore Area Protective Device, Model T-454, serial number 454-98-0075;
4. A Precision Ordnance Products, Multi-Ultra Flash Grenade, Model DD-451, serial number 451-00-1663;
5. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0052;
6. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0053;
7. A Precision Ordnance Products, Magnum Tactical Blast Stun Grenade, Model T-470, serial number 470-99-0121;
8. A Precision Ordnance Products, Magnum Ultra-Flash Stun Grenade, Model T-471, serial number 471-01-0315;
9. A Precision Ordnance Products, Tactical Blast Stun Grenade, Model T-429, serial number 429-01-0325;
10. A Precision Ordnance Products, Tactical Blast Stun Grenade, Model T-429, serial number 429-01-0328;
11. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0329;
12. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0330;
13. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0331;
14. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0332;
15. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0333;
16. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0334;
17. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0335;
18. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0336;
19. A Precision Ordnance Products, Tactical Blast Stun Grenade - 40 mm projectile, Model T-429, serial number 429-01-0338;

20. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0086;
21. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0103;
22. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0104;
23. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0105;
24. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0106;
25. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0107;
26. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0108;
27. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0109;
28. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0110;
29. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0111;
30. A Precision Ordnance Products, Tactical Blast Launchable Stun Grenade, Model T-444, serial number 444-99-0112;
31. A Precision Ordnance Products, Multi-Blast Grenade, Model DD-450, serial number 450-01-0442;
32. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0196;
33. A Precision Ordnance Products, Sure-stop Rubber Impact Grenade, Model I-452, serial number 452-00-0198;
34. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-01-0892;
35. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-01-0895;
36. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-01-0899;
37. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-01-0900;
38. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0817;

39. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0819;
40. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0820;
41. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0821;
42. A Precision Ordnance Products, Tactical Blast Strip, Model T-460, serial number 460-00-0822;
43. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0150;
44. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0152;
45. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0153;
46. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0154;
47. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0155;
48. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0156;
49. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0157;
50. A Precision Ordnance Products, Tactical Rocket Stun Grenade, Model T-465, serial number 465-98-0158;
51. A Precision Ordnance Products, Magnum Tactical Blast Stun Grenade, Model T-470, serial number 470-99-0223;
52. A Precision Ordnance Products, Magnum Tactical Blast Stun Grenade, Model T-470, serial number 470-99-0224;
53. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-0711;
54. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1007;
55. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1009;
56. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1010;
57. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1012;

58. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-01-1016;
59. A Precision Ordnance Products, Standard Flexible Door Breaching Charge (2 units), Model B-520, serial number 520-98-0069;
60. A Precision Ordnance Products, Tactical Blast Stun Grenade, Model T-429, serial number 429-02-1792;
61. A Precision Ordnance Products, Multi-Blast Grenade, Model DD-450, serial number 450-02-1311;
62. A Precision Ordnance Products, Multi Ultra Flash Grenade, Model DD-451, serial number 451-02-1186;
63. A Precision Ordnance Products, Multi Ultra Flash Grenade, Model DD-451, serial number 451-02-1187;
64. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-02-0399;
65. A Precision Ordnance Products, Ultra Flash Stun Grenade, Model T-459, serial number 459-02-0400;
66. A Precision Ordnance Products, Magnum Ultra Flash Stun Grenade, Model T-471, serial number 471-02-0615
67. A Precision Ordnance Products, Bursting Rubber Gas Grenade, Model G-310, serial number 310-98-0162.
68. A Precision Ordnance Products, Bursting Rubber Smoke Grenade, Model DD-359, serial number 359Q-99-0588
69. A Precision Ordnance Products, Bursting Rubber Smoke Grenade, Model DD-359, serial number 359Q-99-0590
70. A Precision Ordnance Products, Bursting Rubber Smoke Grenade, Model DD-359, serial number 359Q-99-0591
71. A Precision Ordnance Products, Illuminator Grenade, Model DD-408, serial number 408-98-0203.
72. A Precision Ordnance Products, Multi-Blast Grenade, Model DD-450, serial number 450-00-_____
73. A Precision Ordnance Products, "Bruiser" Rubber Impact Grenade, Model I-453, serial number 453-98-0422
74. A Precision Ordnance Products, Ultra-Flash Stun Grenade, Model T-459, no serial number
75. A Precision Ordnance Products, "Bruiser" Rubber Impact Grenade, Model I-453, no serial number
76. A Precision Ordnance Products, Distraction Device--label removed, no serial number

- 77. A Precision Ordnance Products, Lock Breaching Charges--no markings, no serial number
- 78. A Precision Ordnance Products, Rubber Impact Grenade--no markings, no serial number

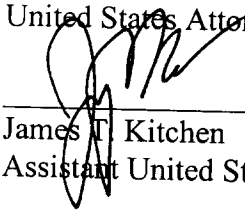
A TRUE BILL:

ORIGINAL SIGNATURE
ON FILE WITH THE CLERK

FOREMAN OF THE GRAND JURY

DONALD J. DeGABRIELLE, JR.
United States Attorney

BY:



James T. Kitchen
Assistant United States Attorney